

Message

From: Cirian, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=98D0FD2CBB3F4F25B819C6929E18D08D-CIRIAN, MIKE]
Sent: 4/4/2018 2:59:22 PM
To: Michael Ritorto [mritorto@rouxinc.com]
CC: Andrew Baris [abaris@rouxinc.com]; John.Stroiazzi@glencore.ca; Steve Wright - CFAC [swright@cfaluminum.com]; Gunnar Emilsson [EmilssonGR@cdmsmith.com]
Subject: Comments to date
Attachments: EPA comments on the Phase II SAP.DOCX

Hello Michael,

Attached are the comments I have received so far. Below are the comments I received from DEQ. I should be receiving comments from Brian S. and David B. by 4/12/18.

Feel free to call if you have any questions,
Mike

The DEQ has reviewed the Phase II site Characterization Sampling and Analysis Plan, dated February 28, 2018 and the CDM comments, dated April 2, 2018, on the Plan.

The DEQ generally agrees with the CDM comments on the proposed phase II SAP, with the following specific emphasis:

Section 6.3.1, page 40 defined the basis for the RIFS.

The main objectives of phase II are to generate the data needed for the risk assessments and to generate the data for evaluation of remedial action options.

Section 4.2, pages 16-17 well defines the specific tasks involved in phase II.

The extensive RI, phase I data base should allow significant screening of COPCs and COPECs with final screening as part of the risk assessments when the phase II data is available.

It is understood that all monitoring wells (old and New) will be sampled twice as part of phase II.

Section 4.6 describes the installation of seven new monitoring wells. The DEQ recommends two additional wells to better define potential impacts on the western residential area (one midway between MW-057 and MW-059 and one 700 feet North of MW-057); the DEQ recommends three additional wells to better define the nature and extent of the cyanide/fluoride plume (one midway between MW-045 and MW-047, one 500 feet West of MW-054, and one 500 feet Northeast of MW-037). Thus 12 new wells (seven recommended by ROUX and five recommended by DEQ) would be installed, developed, and sampled.

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